



Barry Coburn &lt;barry@coburngreenbaum.com&gt;

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**Re: Witness and exhibit disclosures**

1 message

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**Barry Coburn** <barry@coburngreenbaum.com>

Wed, Apr 2, 2025 at 3:37 AM

To: "Monteleoni, Paul (USANYS)" &lt;Paul.Monteleoni@usdoj.gov&gt;

Cc: Sarah Schwietz &lt;sarah@coburngreenbaum.com&gt;, Marc Eisenstein &lt;marc@coburngreenbaum.com&gt;, "Richenthal, Daniel (USANYS)" &lt;Daniel.Richenthal@usdoj.gov&gt;, "Pomerantz, Lara (USANYS)" &lt;Lara.Pomerantz@usdoj.gov&gt;, "Ghosh, Catherine (USANYS)" &lt;Catherine.Ghosh@usdoj.gov&gt;

Bcc: Barry Coburn &lt;barry@coburngreenbaum.com&gt;

Hello all, additional proffer information below about our defense case. Please let us know what additional detail would be useful to you. Best, Barry

**Wael Hana:** Would testify consistently with his proffer of underlying events reflected in his presentence report, including the history of his interactions with Robert and Nadine Menendez and the mortgage loan.

**Fred Daibes:** Would testify about the history of his interactions with Robert and Nadine Menendez including gift giving and real estate interests, with a focus on the timing and rationale for any things of value he provided to the Defendant.

**Katia Tabourian**

Would testify about the Defendant's family history, her attitude toward gift-giving and receiving, and her character and reputation for honesty and truthfulness, in addition to other relevant character traits.

**Robert Menendez:** If we call him, would testify about every aspect of the indictment as it relates to his wife, as well as his relationship with her and her character and reputation for truthfulness.

**Jonathan Cohen:** Would testify about Mr. Menendez's policies and practices, while a senator, relating to the Middle East, particularly his opposition to Egyptian human rights abuses. He would focus on the way Mr. Menendez addressed issues with Egypt before and during the relevant time period.

**Garbis Tabourian:** Similar to his daughter Katia.

**Nicholas Lewin:** Would testify about a financial transaction in which he was involved with Jose Uribe and the Defendant, relating to an alleged loan transaction.

**Michael Critchley:** Would testify that he represented Parra and negotiated the plea for him, he would describe his conversations with Robert Menendez about the case, including why he believed it was an unfair and inappropriate prosecution.

**John Moldovan:** Would expand upon his testimony during the government's case, including all of the substance of his testimony in Trial 1.

**Ana Peguerro:** Expected to testify about the criminal investigation, her knowledge regarding Jose Uribe's related actions, and her related interactions with Jose Uribe.

**Meirna Hanna:** Would testify about her experience working at IS EG Halal, interactions with Wael Hana and Nadine Menendez, and Wael's reputation for gift giving in the business community.

**Carolina Silvarredonda :** Would testify about her experience working at IS EG Halal, interactions with Wael Hana and Nadine Menendez, and the work Nadine did for ISEG Halal.

**Jamela Maali:** Would testify about her experience working with Fred Daibes, her knowledge of gift giving from Mr. Daibes to Nadine Menendez, his reputation for gift giving, and her knowledge of Mr. Daibes' real estate interests.

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On Tue, Apr 1, 2025 at 4:30 PM Monteleoni, Paul (USANYS) <[Paul.Monteleoni@usdoj.gov](mailto:Paul.Monteleoni@usdoj.gov)> wrote:

We hope your client is feeling better. Depending on the pace of trial, on Thursday and Friday we may call the following witnesses and offer in connection with their testimony the following exhibits (in addition to those already disclosed):

Olivia Sebade: 2499

Sean Giesler: 7K-127, 7K-204

Denise Clemons: 2461

Isabella Fuchs: 1335A, 1335B, 1335C, 1335-EX, 1360

Philip Sellinger: 8M-1, 12A-1, 12A-2, 12A-3, 12E-1

Michael Soliman: A129, A130, A131, A421, A422

Raquel Morgan: no exhibits

Nicholas Iorio: 12B-9, 2435-13 (demonstrative)

Paul Van Wie: 8Q-6, 8Q-12, 2A-29

Paul M. Monteleoni

Senior Trial Counsel

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Southern District of New York

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